

1 WRIGHT, FINLAY & ZAK, LLP
2 Robert A. Riether, Esq.
3 Nevada Bar No. 12076
4 Rock K. Jung, Esq.
5 Nevada Bar No. 10906
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
(702) 475-7964; Fax: (702) 946-1345
rjung@wrightlegal.net

7 *Attorneys for Plaintiff, Wells Fargo Bank, N.A., as Trustee for ABFC 2004-OPT3 Trust, ABFC
Asset-Backed Certificates, Series 2004-OPT3*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10
11 WELLS FARGO BANK, N.A., AS TRUSTEE
12 FOR ABFC 2004-OPT3 TRUST, ABFC
13 ASSET-BACKED CERTIFICATES, SERIES
2004-OPT3,

14 Plaintiff,

15 vs.

16 KARI LEE LIMITED PARTNERSHIP;
17 SATICOY BAY, LLC SERIES 5451
18 AUTUMN CROCUS; ALARISA
19 PROPERTIES, LLC; ARBOR PARK
COMMUNITY ASSOCIATION; ABSOLUTE
COLLECTION SERVICES LLC,

20 Defendants.

21 Case No.: 2:17-cv-01184-APG-VCF

22 **STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINES**

23 **[FIRST REQUEST]**

24 Plaintiff, Wells Fargo Bank, N.A., as Trustee for ABFC 2004-OPT3 Trust, ABFC Asset-
25 Backed Certificates, Series 2004-OPT3 (“Wells Fargo” or “Plaintiff”), Defendant, Saticoy
26 Bay, LLC Series 5451 Autumn Crocus (“Saticoy Bay”), Defendant, Absolute Collection
27 Services, LLC (“ACS”) and Defendant, Arbor Park Homeowners Association (“HOA”), by
28 and through their respective attorneys of record, hereby stipulate and agree as follows:

1 WHEREAS, the parties agree to extend dispositive motion deadlines from April 26, 2019
2 to June 10, 2019, to allow the parties additional time to reach a global resolution. The parties
3 have not yet reached an agreement, but they feel one is still possible and additional time is
4 requested to explore settlement and exchange offers. Therefore,

5 IT IS HEREBY STIPULATED AND AGREED that the dispositive motion deadline
6 should be continued for 45 days from April 26, 2019 to June 10, 2019, to permit the parties
7 additional time to discuss potential settlement and resolution of all pending claims.

8 IT IS HEREBY STIPULATED AND AGREED that if a global resolution is not reached
9 prior to the extended dispositive motion deadline, then the parties shall proceed with dispositive
10 motion practice.

11 This is the parties' first request for extension of the deadline to file dispositive
12 motions. This request is not intended to cause any delay or prejudice to any party.

13 IT IS SO STIPULATED.

14
15 DATED this 23rd day of April, 2019.

16 WRIGHT, FINLAY & ZAK, LLP

17
18 */s/ Rock K. Jung, Esq.*

19 Robert A. Riether, Esq.
20 Nevada Bar No. 12076
21 Rock K. Jung, Esq.
22 Nevada Bar No. 10906
23 7785 W. Sahara Ave., Suite 200
24 Las Vegas, NV 89117
25 Attorneys for Plaintiff, Wells Fargo Bank,
26 N.A., as Trustee for ABFC 2004-OPT3 Trust,
27 ABFC Asset-Backed Certificates, Series 2004-
28 OPT3

14
15 DATED this 23rd day of April, 2019.

16 LAW OFFICES OF MICHAEL F. BOHN,
17 ESQ., LTD.

18
19 */s/ Michael F. Bohn, Esq.*

20 Michael F. Bohn, Esq.
21 Nevada Bar No. 1641
22 Adam R. Trippiedi, Esq.
23 Nevada Bar No. 12294
24 2260 Corporate Circle, Suite 480
25 Henderson, Nevada 89074
26 Attorney for Defendant, Defendant Saticoy
27 Bay LLC

28 *Signatures continued on next page*

1 DATED this 23rd day of April, 2019.

2 ABSOLUTE COLLECTION SERVICES,
3 LLC

4 /s/ Shane D. Cox, Esq.

5 Shane D. Cox, Esq.
6 Nevada Bar No. 13852
7 8440 W. Lake Mead Blvd., Suite 210
8 Las Vegas, NV 89128
9 *Attorneys for Defendant, Absolute Collection
Services, LLC*

10 DATED this 23rd day of April, 2019.

11 TYSON & MENDES, LLP

12 /s/ Margaret E. Schmidt, Esq.

13 Margaret E. Schmidt, Esq.
14 Nevada Bar No. 12489
15 3960 Howard Hughes Pkwy, Suite 600
16 Las Vegas, Nevada 89169
17 *Attorney for Defendant, Arbor Park
18 Homeowners Association*

19 **ORDER**

20 IT IS SO ORDERED:

21 
22 UNITED STATES MAGISTRATE JUDGE

23 4-24-2019

24 DATED: _____